

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001

Henry Acker
Robert Albano
Dmitri Arshavsky
Ramiro Ayala
Olanrewaju Ayinde
Waldemar Balcer
Albert Benzaquen
John Bossee
Michael Brumer
Richard Burban
Peter Carretta
Beatriz Carvajal
Dewayne Catterton
Jerzy Choromanski
Miroslaw Chrostowski
Paul Dantona
Michael Dee
Michael Delfino
Joseph Delre
Jerzy Drazek
James Eisert
Gregory Elyashkevich
Ricardo Espinoza
Doretta Fabbri
George Freyre
Julia Giambrone
Jan Glowczynski
Landon Goodleaf
Anna Gorska
David Green
Rafael Hernandez
Martha Hoyos
Krystyna Huryn
Janusz Huss
Maritza Iglesia
James Impastato
Gwendolyn James
Tomar Johnson

As relates to: 03 MDL 1570
(GBD)(SN)

Civil Docket Number:

SHORT FORM
COMPLAINT AND
DEMAND FOR TRIAL BY
JURY

ECF CASE

Roman Kaczowska	
Dennis Kelly	
Shaukat Khan	
Janusz Kowalewski	
Sylwester Kurpiewski	
Wladyslaw Kwasnik	
Richard Lee	
Lawrence Levine	
Gerald Logan	
Janusz Maciejaszek	
Robert Marchak	
Francisca Martinez	
Jerzy Maslinski	
Robert Mauceri	
Zelma Ann Mckenzie- Singleton	
Dinorah Mejia	
Peter Mikes	
Corenelius Miles	
Lorraine Miller	
Oleksiy Miroshnychenko	
Maria Moreno	
Khalil Mrabet	
Wieslaw Mroz	
Andrzej Mulka	
Alexandra Muszak	
Nancy Nina	
Dariusz Nosorowski	
Andrew Obszanski	
Luis O'Campo	
Loretta O'Donnell	
Bogumil Olszewski	
Arkadiusz Orlowski	
Brewster Paley	
Fern Parness	
Vincent Pastore	
Mario Persichilli	
Irena Perzynska	
Hanna Pieczynska	
Rudolf Pisarcik	
Henry Podkowa	
Delfin Polanco	
Larysa Prokhna	
Joseph Rabito	
Anthony Rafaniello	

Rajka Rajacic	
Candida Perdomo Ramirez	
Vidalilia Maria Gomez Ramirez	
Dalila Ramos	
Eileen Rawlinson	
David Rivera	
Joseph Rizzo	
Wanda Roguso-Sheehan	
Volodymyr Romanchuk	
Waldemar Ropel	
James Rossiter	
Lara Roth-Biester	
Adam Rozanski	
Piotr Rzasa	
Robert Rzasa	
Eva Salapa-Dawdo	
Demetrius Samad Jopoulos	
Maria Sander	
Eric Schnellbacher	
Samuel Taylor Seawright	
Esardai S. Sewdass	
Daniel Shaufler	
Tomasz Siemiatkowski	
Zanon Skardow	
Eugeniusz Skrzeczkowski	
Zbigniew Sosnowski	
Mieczyslaw Sowa	
Jerzy Stefanski	
Jan Strohbach	
Waldemar Strojek	
Zbyszek Szalaj	
Andrzej Szplitgejber	
Deighton Cleve Taylor	
Jozef Terejko	
Silvia Tineo	
Krzysztof Turowski	
Jacek Tyminski	
Mykola Uglyk	
Zdzislaw Usewicz	
Rosa Valentin	
Michael Valentino	
Mykhaylo Vynar	
Michael Wade	
Thomas Warner	

<p>Robert W. Warrington Leslie E. Weinberg Melvin Weiner Jan Welenc Antoni Wilinski Melvyn Richard Williams Bogumil Wojcicki Jan Wojdyla Ephanis Wright Dariusz Wyszomirski Robert Yuknavech Boguslaw Zalewski Victor Zapata Volodymyr Zarytskyy David Zimmer Nadir Zouak Miroslav Zuscak Marialisa Zywtchenko</p>	
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PLAINTIFFS,

V.

**KINGDOM OF SAUDI ARABIA;
SAUDI HIGH COMMISSION FOR
RELIEF OF BOSNIA &
HERZEGOVINA**

DEFENDANTS

SHORT FORM COMPLAINT AND DEMAND FOR TRIAL BY JURY

Plaintiff(s) file(s) this *Short Form Complaint and Demand for Trial by Jury* against Defendants named herein by and through the undersigned counsel. Plaintiff(s) incorporate(s) by reference the specific allegations, as indicated below, of Plaintiffs' *Consolidated Amended Complaint* as to the Kingdom of Saudi Arabia ("Kingdom" or "Saudi Arabia") and the Saudi

High Commission for Relief of Bosnia & Herzegovina (“the SHC”) and *Demand for Jury Trial* in *In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570* in the United States District Court for the Southern District of New York (hereinafter “the CAC”). Plaintiff(s) file(s) this *Short Form Complaint and Demand for Jury Trial* as permitted and approved by the Court’s Order of May 3, 2017, ECF No. 3543.

VENUE

1. Venue in this district is proper pursuant to 28 U.S.C. §§ 1391(b)(2) and 1391(f)(1), as a substantial part of the events giving rise to the claims asserted herein occurred in this district. Venue is also proper in this district pursuant to 18 U.S.C. § 2334(a).

JURISDICTION

2. Jurisdiction, is as asserted in the CAC, and further, jurisdiction of the within *Short Form Complaint* is premised upon and applicable to all defendants in this action:

28 U.S. C. § 1605(a)(5) (non-commercial tort exception)

28 U.S. C. § 1605B (Justice against Sponsors of Terrorism Act)

Other: (set forth below the basis of any additional ground for jurisdiction and plead such in sufficient detail as per the FRCP): _____

CAUSES OF ACTION

3. Plaintiff(s) hereby adopt(s) and incorporate(s) by reference, the CAC as if set forth fully herein.

4. Furthermore, the following claims and allegations are asserted by Plaintiff(s) and are herein adopted by reference from the CAC:

- Aiding and Abetting and Conspiring with al Qaeda to Commit the September 11th Attacks Upon the United States in Violation of 18 U.S.C. § 2333(d) (JASTA)
- Aiding and Abetting and Conspiring with al Qaeda to Commit the September 11th Attacks Upon the United States in Violation of 18 U.S.C. § 2333(a)
- Committing Acts of International Terrorism in Violation of 18 U.S.C. § 2333
- Wrongful Death, as applicable to a claim for such
- Survival
- Alien Tort Claims Act
- Assault and Battery
- Conspiracy
- Aiding and Abetting
- Intentional Infliction of Emotional Distress
- Liability Pursuant to Restatement (Second) of Torts § 317 and Restatement (Third) of Agency § 7.05: Supervising Employees and Agents
- Liability Pursuant to Restatement (Second) of Torts § 317 and Restatement (Third) of Agency § 7.05: Hiring, Selecting, and Retaining Employees and Agents
- 18 U.S.C. § 1962(a)-(d) – CIVIL RICO

Trespass

Punitive Damages

Plaintiff assert(s) the following additional theories and/or Causes of Action against the Defendants: _____

IDENTIFICATION OF PLAINTIFFS

5. The following allegations and information contained herein, is alleged as to each individual who is bringing this claim, as indicated on Appendix 1 to this *Short Form Complaint*, and/or as to each decedent who was injured and who is now deceased, whose claim is brought by the Estate representative, and as to the survivors of the Estate, herein referred to as "Plaintiffs."
 - a. The citizenship/nationality of said Plaintiff is indicated at Appendix 1 to this Short Form Complaint.
 - b. Said Plaintiff is entitled to recover damages on the causes of action set forth in this Complaint.
 - c. As indicated at Appendix 1, said Plaintiff was injured as a result of the terrorist attacks of September 11, 2001; is the estate representative of someone who was injured as a result of the terrorist attacks of September 11, 2001 and who is now deceased, or is a survivor of someone who was injured as a result of the terrorist attacks of September 11, 2001 and who is now deceased.
 - d. For those plaintiffs with injury claims, as indicated in Appendix 1, on or after September 11, 2001, said Plaintiff was present at the Pentagon and/or the World

Trade Center site and/or its surroundings and/or lower Manhattan and/or at an area wherein he/she was exposed to toxins as a result of the terrorist attacks and was exposed to toxins from the attacks, and/or was otherwise injured, and/or as otherwise alleged: _____.

- e. As a direct, proximate and foreseeable result of Defendants' actions or inactions, Plaintiff suffered bodily injury and/or death, and consequently economic and other losses, including but not limited to pain and suffering, emotional distress, psychological injuries, and loss of enjoyment of life, and as otherwise described in the CAC, and/or as otherwise may be specified in subsequent pleadings and/or discovery proceedings, and/or as otherwise alleged herein: _____.
- f. The name, relationship to the injured 9/11 victim, residency, citizenship/nationality, and the general nature of the claim for each plaintiff is listed on the attached Appendix 1, and is incorporated herein as allegations, with all allegations of the within *Short Form Complaint* deemed alleged as to each plaintiff.

IDENTIFICATION OF THE DEFENDANTS

6. The following entities are Defendants herein:

Kingdom of Saudi Arabia

Saudi High Commission for Relief of Bosnia & Herzegovina

Plaintiffs' constituent case, if applicable, and this *Short Form Complaint* shall be

deemed subject to any motion to dismiss the CAC or Answer to the CAC filed by Saudi Arabia or the SHC. By way of filing this *Short Form Complaint*, plaintiffs shall not be deemed to have adopted any class-action allegations set forth in the CAC or waived any right to object to class certification or opt out of any certified class. This *Short Form Complaint* also does not serve as a request for exclusion from any class that the Court may certify.

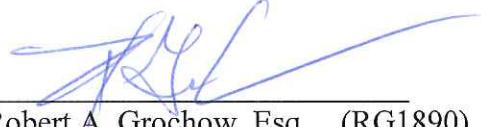
WHEREFORE, Plaintiff(s) pray(s) for relief and judgment against Defendants as set forth in the CAC as appropriate.

JURY DEMAND

Plaintiff(s) hereby demand(s) a trial by jury as to the claims in this action.

Dated: August 1, 2018

Respectfully Submitted on behalf of the Plaintiffs:


By: Robert A. Grochow, Esq. (RG1890)
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and

s/
By: Alan J. Fuchsberg, Esq.
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Counsel for Plaintiff(s)

Defendants:

KINGDOM OF SAUDI ARABIA

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Frederick, P.L.L.C
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Tel#: 202-326-7900

**SAUDI HIGH COMMISSION FOR RELIEF
OF BOSNIA & HERZEGOVINA**

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Robbins, Russell, Englert, Orseck, Untereiner &
Sauber, LLP
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1801 K Street N.W. Suite 411L
Washington, DC 20006
Tel#: 202-775-4503

APPENDIX 1 TO THE SHORT FORM COMPLAINT DATED August 1, 2018

Each line below is deemed an allegation, incorporating the allegations, language and references within the *Short Form Complaint* to which this Appendix is appended, and shall be referenced as Allegation 1 of Appendix 1 to the *Short Form Complaint*, Allegation 2 of Appendix 1 to the *Short Form Complaint*, etc.)

*PI = Personal Injury; WD = Wrongful Death; SO = Solatium;

	PLAINTIFF(S) NAME IN ALPHABETICAL ORDER OF LAST NAME OF INJURED PERSON		Relationship to Injured 9/11 Victim	State of Residency at Filing	Country of Citizenship/ Nationality on 9/11/2001	General Nature of Claim Asserted*
1	Henry	Acker	Self	New York	United States	PI
2	Robert	Albano	Self	New York	United States	PI
3	Dmitri	Arshavsky	Self	New York	United States	PI
4	Ramiro	Ayala	Self	New York	United States	PI
5	Olanrewaju	Ayinde	Self	Nigeria	Nigeria	PI
6	Waldemar	Balcer	Self	New York	Poland	PI
7	Albert	Benzaquen	Self	New York	United States	PI
8	John	Bosee	Self	Connecticut	United States	PI
9	Michael	Brumer	Self	New York	United States	PI
10	Richard	Burban	Self	New York	United States	PI
11	Peter	Carretta	Self	New York	United States	PI
12	Beatriz	Carvajal	Self	New York	United States	PI
13	Dewayne	Catterton	Self	Indiana	United States	PI
14	Jerzy	Choromanski	Self	New York	Poland	PI
15	Miroslaw	Chrostowski	Self	New York	United States	PI
16	Paul	Dantona	Self	New York	United States	PI
17	Michael	Dee	Self	New York	United States	PI
18	Michael	Delfino	Self	New York	United States	PI
19	Joseph	Delre	Self	New York	United States	PI
20	Jerzy	Drazek	Self	New York	Poland	PI
21	James	Eisert	Self	New York	United States	PI
22	Gregory	Elyashkevich	Self	New York	United States	PI

23	Ricardo	Espinosa	Self	New York	Colombia	PI
24	Doretta	Fabbri	Self	New York	United States	PI
25	George	Freyre	Self	New York	United States	PI
26	Julia	Giambrone	Self	Connecticut	United States	PI
27	Jan	Glowczynski	Self	New York	Poland	PI
28	Landon	Goodleaf	Self	Canada	Canada and United States	PI
29	Anna	Gorska	Self	New York	Poland	PI
30	David	Green	Self	New York	United States	PI
31	Rafael	Hernandez	Self	Florida	United States	PI
32	Martha	Hoyos	Self	New York	Colombia	PI
33	Krystyna	Huryn	Self	New York	United States and Poland	PI
34	Janusz	Huss	Self	New York	Poland	PI
35	Maritza	Iglesia	Self	New York	United States	PI
36	James	Impastato	Self	New Jersey	United States	PI
37	Gwendolyn	James	Self	New York	United States	PI
38	Tomar	Johnson	Self	New York	United States	PI
39	Roman	Kaczowska	Self	New York	United States and Poland	PI
40	Dennis	Kelly	Self	New Jersey	United States	PI
41	Shaukat	Khan	Self	New York	Pakistan	PI
42	Janusz	Kowalewski	Self	Poland	Poland and Canada	PI
43	Sylwester	Kurpiewski	Self	New York	Poland	PI
44	Wladyslaw	Kwasnik	Self	New York	United States and Poland	PI
45	Richard	Lee	Self	New York	United States	PI
46	Lawrence	Levine	Self	New York	United States	PI
47	Gerald	Logan	Self	New York	United States	PI
48	Janusz	Maciejasiek	Self	New Jersey	Poland	PI
49	Janusz	Maciejaszek	Self	New Jersey	Poland	PI
50	Robert	Marchak	Self	New Jersey	United States	PI
51	Francisca	Martinez	Self	New York	Honduras	PI
52	Jerzy	Maslinski	Self	New York	Poland	PI
53	Robert	Mauceri	Self	New York	United States	PI
54	Zelma Ann	Mckenzie-Singleton	Self	South Carolina	United States	PI

55	Dinorah	Mejia	Self	New York	Dominican Republic	PI
56	Peter	Mikes	Self	New York	United States	PI
57	Corenelius	Miles	Self	New York	United States	PI
58	Lorraine	Miller	Self	New York	United States	PI
59	Oleksiy	Miroshnychenko	Self	New York	Ukrainian	PI
60	Maria	Moreno	Self	New York	Colombia	PI
61	Khalil	Mrabet	Self	New York	United States	PI
62	Wieslaw	Mroz	Self	New York	Poland	PI
63	Andrzej	Mulka	Self	New York	Poland	PI
64	Alexandra	Muszak	Self	New York	United States and Poland	PI
65	Nancy	Nina	Self	New York	Dominican Republic	PI
66	Dariusz	Nosorowski	Self	Poland	Poland	PI
67	Andrew	Obszanski	Self	New York	United States	PI
68	Luis	O'Campo	Self	New York	United States	PI
69	Loretta	O'Donnell	Self	New Jersey	United States	PI
70	Bogumil	Olszewski	Self	Poland	Poland	PI
71	Arkadiusz	Orlowski	Self	New York	Poland	PI
72	Brewster	Paley	Self	New York	United States	PI
73	Fern	Parness	Self	New York	United States	PI
74	Vincent	Pastore	Self	New York	United States	PI
75	Mario	Persichilli	Self	New York	Italy	PI
76	Irena	Perzynska	Self	New York	Poland	PI
77	Hanna	Pieczynka	Self	New York	United States and Poland	PI
78	Rudolf	Pisarcik	Self	New York	Slovakia	PI
79	Henry	Podkowa	Self	New Jersey	Poland	PI
80	Delfin	Polanco	Self	New York	Dominican Republic	PI
81	Larysa	Prokhna	Self	New York	Ukrainian	PI
82	Joseph	Rabito	Self	New York	United States	PI
83	Anthony	Rafaniello	Self	New Jersey	United States	PI
84	Rajka	Rajacic	Self	New York	Yugoslavia	PI
85	Candida Perdomo	Ramirez	Self	New York	Dominican Republic	PI

86	Vidalilia Maria Gomez	Ramirez	Self	Florida	Colombia	PI
87	Dalila	Ramos	Self	New York	United States	PI
88	Eileen	Rawlinson	Self	New York	United States	PI
89	David	Rivera	Self	New York	United States	PI
90	Joseph	Rizzo	Self	New Jersey	United States and Italy	PI
91	Wanda	Roguso-Sheehan	Self	New York	United States	PI
92	Volodymyr	Romanchuk	Self	New York	Ukrainian	PI
93	Waldemar	Ropel	Self	New York	United States	PI
94	James	Rossiter	Self	New York	United States	PI
95	Lara	Roth-Biester	Self	New York	United States	PI
96	Adam	Rozanski	Self	New York	Poland	PI
97	Piotr	Rzasa	Self	New York	Poland	PI
98	Robert	Rzasa	Self	New York	Poland	PI
99	Eva	Salapa-Dawdo	Self	New York	United States and Poland	PI
100	Maria	Sander	Self	New York	United States	PI
101	Eric	Schnellbacher	Self	New Jersey	United States	PI
102	Samuel Taylor	Seawright	Self	New York	United States	PI
103	Esardai S.	Sewdass	Self	New York	United States	PI
104	Daniel	Shaufler	Self	Pennsylvania	United States	PI
105	Zanon	Skardow	Self	New York	Poland	PI
106	Eugeniusz	Skrzeczkowski	Self	New York	United States	PI
107	Zbigniew	Sosnowski	Self	New York	Poland	PI
108	Mieczyslaw	Sowa	Self	New York	Poland	PI
109	Jerzy	Stefanski	Self	New York	Poland	PI
110	Jan	Strohbach	Self	New York	Poland	PI
111	Waldemar	Strojek	Self	New York	Poland	PI
112	Zbyszek	Szalaj	Self	New York	Poland	PI
113	Deighton Cleve	Taylor	Self	New York	United States	PI
114	Jozef	Terejko	Self	New York	Poland	PI
115	Silvia	Tineo	Self	New York	United States	PI
116	Krzysztof	Turowski	Self	New York	Poland	PI
117	Jacek	Tyminski	Self	New York	Poland	PI
118	Mykola	Uglyk	Self	New York	United States	PI
119	Zdzislaw	Usewicz	Self	New York	Poland	PI

120	Michael	Valentino	Self	New York	United States	PI
121	Mykhaylo	Vynar	Self	New York	Ukrainian	PI
122	Michael	Wade	Self	New York	United States	PI
123	Thomas	Warner	Self	Florida	United States	PI
124	Robert W.	Warrington	Self	New York	United States	PI
125	Leslie E.	Weinberg	Self	New York	United States	PI
126	Melvin	Weiner	Self	New Jersey	United States	PI
127	Jan	Welenc	Self	New York	United States and Poland	PI
128	Antoni	Wilinski	Self	Poland	Poland	PI
129	Melvyn Richard	Williams	Self	United Kingdom	Britain	PI
130	Bogumil	Wojcicki	Self	New York	Poland	PI
131	Ephanis	Wright	Self	New York	United States	PI
132	Dariusz	Wyszomirski	Self	New York	Poland	PI
133	Robert	Yuknavech	Self	New York	United States	PI
134	Boguslaw	Zalewski	Self	New York	Poland	PI
135	Victor	Zapata	Self	Colombia	Colombia	PI
136	Volodymyr	Zarytskyy	Self	New York	Ukrainian	PI
137	David	Zimmer	Self	New Jersey	United States	PI
138	Nadir	Zouak	Self	New Jersey	United States	PI
139	Miroslav	Zuscak	Self	New York	Slovakia	PI
140	Marialisa	Zywochenko	Self	New York	United States	PI